

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**ARTHUR BABERS,**

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**vs.**

\* **Civil Action No.:**

**AMERICAN INTERNATIONAL GROUP, INC;  
et al.,**

\* **2:06-cv-00077-WHA**

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**Defendants.**

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**NOTICE OF CORRECTION**

COMES NOW, counsel for Plaintiff, and serves notice of a misstated fact referenced in his *Opposition to Defendants' Motion for Leave to Conduct Remand-Related Discovery* (Document # 15).

1. On page seven (7) of the above referenced motion, Plaintiff's counsel erroneously stated that Judge Fuller of the United States District Court for the Middle District of Alabama recently remanded two identical cases, citing Willie Lee Poole v. American International Group, Inc., et al., Civil Action No. 2:05cv774-MEF (M.D.Ala. February 9, 2006) and Joe T. Smith v. American International Group, Inc., et al., Civil Action No. 2:05cv1065-MEF (M.D.Ala. February 10, 2006). In fact, only the Joe T. Smith case has been remanded. The court has not ruled on the *Motion to Remand* in the Willie Lee Poole case, but had ruled on the issue of remand-related discovery. The Motion to Remand is still pending.

2. Plaintiff's counsel genuinely apologizes for this oversight and any confusion this may have caused.

Corrected this, the 2<sup>nd</sup> day of March, 2006.

/s/ Charles Lance Gould  
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Attorney for Plaintiff

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**CERTIFICATE OF SERVICE**

I hereby certify that on this the 2<sup>nd</sup> day of March, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

/s/ Charles Lance Gould  
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